

SETH M. REISS, AAL, ALLLC
Seth M. Reiss, Bar No. 2774
3770 Lurline Drive
Honolulu, HI 96816
Telephone: 808-521-7080
Facsimile: 808-675-5805
E-mail: seth.reiss@lex-ip.com

RANDAZZA LEGAL GROUP
Marc Randazza*
(Cal. Bar No. 269535)
6525 W. Warm Springs Road, Suite 100
Las Vegas, NV 89118
Telephone: 888-667-1113
Facsimile: 305-437-7662 (fax)
E-mai: MJR@Randazza.com
*(Pending Pro Hac Vice Admission)

Attorneys for Plaintiff,
THIRD WORLD MEDIA, LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

THIRD WORLD MEDIA, LLC.

Plaintiff,

vs.

HAWAII MEMBERS OF SWARM OF
JULY 13, 2011 TO JULY 25, 2011
SHARING HASH FILE
BD55F2868E09C08DADFC1032CCE4
3DE2BC1A2D17; RANDALL M.
MORITA, GARY SOLIVAR, AND
DOES 1, 5, 13 AND 14,

Defendants.

Case No. 1:11-cv-00536-DAE -RLP
(Copyright)

**PLAINTIFF'S MOTION FOR ENTRY
OF A JUDGMENT ON THE
PLEADINGS AGAINST DEFENDANT
RANDALL M. MORITA AND FOR AN
ORDER DIRECTING DEFENDANT
MORITA TO FILE A TERMINATION
STATEMENT WITH RESPECT TO
THE WRONGFULLY RECORDED
UCC FINANCING STATEMENT;
MEMORANDUM IN SUPPORT OF
MOTION; DECLARATION OF
COUNSEL; CERTIFICATE OF
SERVICE**

**PLAINTIFF'S MOTION FOR ENTRY OF A JUDGMENT ON THE
PLEADINGS AGAINST DEFENDANT RANDALL M. MORITA AND FOR
AN ORDER DIRECTING DEFENDANT MORITA TO FILE A**

**TERMINATION STATEMENT WITH RESPECT TO THE
WRONGFULLY RECORDED UCC FINANCING STATEMENT**

NOW COMES Plaintiff THIRD WORLD MEDIA, LLC ("Plaintiff" or "Third World"), by and through its attorneys above named, and moves this Honorable Court for Entry of a Judgment on the Pleadings against Defendant RANDALL M. MORITA ("Defendant Morita") in the amount of \$8,500, and for an order directing Defendant Morita to file a termination statement with the Bureau of Conveyances of the State of Hawaii terminating the UCC Financing Statement that Defendant Morita wrongfully filed against Plaintiff and its local counsel of record.

This motion is made pursuant to Rules 8(b)(6) and 12(c), Fed. R. Civ. P., and is based upon and supported by the memorandum and declaration submitted herewith and the records and files herein,

DATED: Honolulu, Hawaii, May 23, 2012.

SETH M REISS, AAL, ALLLC
RANDAZZA LEGAL GROUP

/s/ Seth M. Reiss
SETH M. REISS
MARC J. RANDAZZA

Attorneys for Plaintiff
THIRD WORLD MEDIA, LLC